

## **EXHIBIT 7**

Mr. Clough's May 15, 2025 E-mail

## Katie Cannata

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**From:** Stephen Clough <sgc@mgalaw.com>  
**Sent:** Thursday, May 15, 2025 8:57 AM  
**To:** Katie Cannata; Nona ML. Lawrence; Michael P. Somps; R. A. Nahabedian, Esq.  
**Cc:** Lawrence J. Semenza, III; Olivia A. Kelly; Angie Barreras; Yadira Gonzalez  
**Subject:** RE: Padilla v. MGM et al - Continued Meet and Confer Conference

Good morning,  
Mr. Nahabedian will not be joining the Zoom call this morning due to his family emergency.  
I am prepared to move forward with all of the items on the agenda for today.

Thank you.  
Regards,

**Stephen G. Clough | Partner**  
**MAIER GUTIERREZ & ASSOCIATES**  
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Las Vegas, Nevada 89148  
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**From:** Katie Cannata <klc@semenzarickard.com>  
**Sent:** Tuesday, May 13, 2025 10:00 AM  
**To:** Stephen Clough <sgc@mgalaw.com>; Nona ML. Lawrence <nlawrence@ag.nv.gov>; Michael P. Somps <MSomps@ag.nv.gov>; R. A. Nahabedian, Esq. <raffi@nahabedianlaw.com>  
**Cc:** Lawrence J. Semenza, III <ljs@semenzarickard.com>; Olivia A. Kelly <oak@semenzarickard.com>; Angie Barreras <alb@semenzarickard.com>; Yadira Gonzalez <yg@mgalaw.com>  
**Subject:** RE: Padilla v. MGM et al - Continued Meet and Confer Conference

All –

Below is the Zoom link we'll utilize for Thursday's conference:

<https://zoom.us/j/95052127283?pwd=ENqqoFrUgaH6SCawBtIJuNLwy9HShG.1>

Meeting ID: 950 5212 7283  
Passcode: 603916

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**From:** Katie Cannata  
**Sent:** Tuesday, May 13, 2025 7:57 AM  
**To:** Stephen Clough <sgc@mgalaw.com>; Nona ML. Lawrence <nlawrence@ag.nv.gov>; Michael P. Somps <MSomps@ag.nv.gov>; R. A. Nahabedian, Esq. <raffi@nahabedianlaw.com>  
**Cc:** Lawrence J. Semenza, III <ljs@semenzarickard.com>; Olivia A. Kelly <oak@semenzarickard.com>; Angie Barreras <alb@semenzarickard.com>; Yadira Gonzalez <yg@mgalaw.com>  
**Subject:** RE: Padilla v. MGM et al - Continued Meet and Confer Conference

All –

We will schedule the continued meet and confer for 9 a.m. on Thursday. I'll circulate the zoom link once it is received.

Thanks.

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**From:** Stephen Clough <[sgc@mgalaw.com](mailto:sgc@mgalaw.com)>

**Sent:** Monday, May 12, 2025 4:16 PM

**To:** Katie Cannata <[klc@semenzarickard.com](mailto:klc@semenzarickard.com)>; Nona ML. Lawrence <[nlawrence@ag.nv.gov](mailto:nlawrence@ag.nv.gov)>; Michael P. Soms <[MSoms@ag.nv.gov](mailto:MSoms@ag.nv.gov)>; R. A. Nahabedian, Esq. <[raffi@nahabedianlaw.com](mailto:raffi@nahabedianlaw.com)>

**Cc:** Lawrence J. Semenza, III <[ljs@semenzarickard.com](mailto:ljs@semenzarickard.com)>; Olivia A. Kelly <[oak@semenzarickard.com](mailto:oak@semenzarickard.com)>; Angie Barreras <[alb@semenzarickard.com](mailto:alb@semenzarickard.com)>; Yadira Gonzalez <[yg@mgalaw.com](mailto:yg@mgalaw.com)>

**Subject:** RE: Padilla v. MGM et al - Continued Meet and Confer Conference

Good afternoon all,

Raffi had a family emergency soon after our last telephone conference which has required his full attention. This emergency will be continuing until at least tomorrow.

However, Raffi has informed me he can make himself available on Thursday at the time below for the continued Meet and Confer Conference.

Thank you for your patience and understanding,

Regards,

**Stephen G. Clough | Partner**

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**From:** Katie Cannata <[klc@semenzarickard.com](mailto:klc@semenzarickard.com)>

**Sent:** Friday, May 9, 2025 12:41 PM

**To:** Nona ML. Lawrence <[nlawrence@ag.nv.gov](mailto:nlawrence@ag.nv.gov)>; Michael P. Soms <[MSoms@ag.nv.gov](mailto:MSoms@ag.nv.gov)>; R. A. Nahabedian, Esq. <[raffi@nahabedianlaw.com](mailto:raffi@nahabedianlaw.com)>; Stephen Clough <[sgc@mgalaw.com](mailto:sgc@mgalaw.com)>

**Cc:** Lawrence J. Semenza, III <[ljs@semenzarickard.com](mailto:ljs@semenzarickard.com)>; Olivia A. Kelly <[oak@semenzarickard.com](mailto:oak@semenzarickard.com)>; Angie Barreras <[alb@semenzarickard.com](mailto:alb@semenzarickard.com)>; Yadira Gonzalez <[yg@mgalaw.com](mailto:yg@mgalaw.com)>

**Subject:** Padilla v. MGM et al - Continued Meet and Confer Conference

All –

In order to schedule a continued meet and confer conference, please let us know if any of the following dates/times work for your offices:

Tuesday, May 13<sup>th</sup> (anytime)

Thursday, May 15<sup>th</sup> (between 8 am – 10 am)

Also, for reference, the proposed MGM FRCP 30b6 topics presented by the AG's office are below:

1) Player identification cards and the process for obtaining them, tracking them and inputting information into the MGM system; and

2) Surveillance video and the process for identifying problems on the casino floor, authentication of the video, retention of the video, procedures when a crime has occurred (including what NVGCB agents are showed), and process for production in civil and/or criminal cases.

With regard to our prior discussions concerning Plaintiff's FRCP 30(b)(6) topics (as well as MGM's objections thereto, and Plaintiff's response to those objections), it is our recollection that the parties did not discuss the specifics of each topic and MGM's related objections, given that the conversation turned toward a conversation regarding mediation. We believe that MGM's objection letter (and Plaintiff's response) – both of which were provided in Mr. Clough's email this afternoon – should serve as a roadmap for our continued meet and confer on this subject.

As it relates to the NVGCB FRCP 30(b)(6) deposition, MGM previously vacated it due to the mediation/stay of discovery. I've attached the prior notice of deposition and corresponding subpoena here for reference. We can discuss mutually workable dates to re-notice this deposition during the continued meet and confer as well.

Thanks,

Katie L. Cannata, Esq.

**Semenza Rickard Law**

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